

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

**DEBRA BEYAH,**

**Plaintiff,**

**v.**

**WAL MART STORES, INC.,**

**Defendant.**

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**CIVIL ACTION NO.:  
1:06-cv-00659-CSC**

**JOINT MOTION FOR EXTENSION OF DISCOVERY AND  
DISPOSITION MOTION DEADLINES, AND STAY OF CASE FOR MEDIATION**

COMES NOW the Plaintiff, Debra Beyah, and the Defendant, Wal Mart Stores, Inc., and jointly move this Honorable Court to extend the discovery and dispositive motion deadlines forty-five (45) days, and stay the above-styled cause for mediation. In support of this motion, the parties state as follows:

1. Pursuant to the Court's Scheduling Order, the dispositive motion deadline is May 30, 2007 and the discovery deadline is August 14, 2007.
2. Extensive paper discovery has been conducted, the deposition of the plaintiff has been taken, and the plaintiff has taken two depositions and has re-noticed depositions of six (6) individuals to be taken on May 30 and June 1, 2007. The depositions are taking longer than originally anticipated and may or not be completed on these two dates. However, sufficient discovery has been completed for the parties to conclude that mediation may be productive at this point in the litigation.
3. The parties request a stay in the case for mediation purposes to avoid incurring additional legal fees and expenses, which may hinder settlement negotiations.

4. The parties request this Court extend the current discovery deadline and dispositive motion deadline by forty-five (45) days, the dispositive motion deadline to be extended to July 16, 2007, and the discovery deadline to be extended to September 28, 2007. The parties are not requesting an extension of the present trial date set for October 1, 2007.
5. The parties do not anticipate that any further extensions will be necessary.
6. Counsel for the defendant has reviewed this Motion and has given counsel for the plaintiff permission to submit her electronic signature hereon.

WHEREFORE, the parties jointly move the Court to enter an order granting the extension of the discovery and dispositive motion deadlines, and for stay of the case for mediation as set out herein.

Respectfully submitted,

s/ Ann C. Robertson  
Ann C. Robertson  
Temple D. Trueblood  
Attorneys for the Plaintiff

OF COUNSEL:

WIGGINS, CHILDS, QUINN & PANTAZIS, L.L.C.  
The Kress Building  
301 19th Street North  
Birmingham, Alabama 35203  
(205)314-0500

CO-COUNSEL:

Bobbie S. Crook, Esq.  
367 South St. Andrews Street  
Dothan, AL 36301  
(334) 671-8062

s/ Charlotte K. McClusky  
Charlotte K. McClusky  
Attorney for the Defendant

Charlotte K. McClusky  
LITTLER MENDELSON  
A Professional Corporation  
3348 Peachtree Road, N.E.  
Suite 1100  
Atlanta, Georgia 30326-1008  
(404) 233-0330

CO-COUNSEL:

Scott A. Forman, Esq.  
LITTLER MENDELSON  
A Professional Corporation  
2 South Biscayne Blvd.  
One Biscayne Tower, Ste. 1500  
Miami, Florida 33131  
(305) 400-7500